

2:23-cv-03452-JAK-MRW

TODD MICHAEL SCHULTZ
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In Pro Per

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA – LOS ANGELES

PLAINTIFF

Case No: 2:23-cv-03452-JAK-MRWx

TODD MICHAEL SCHULTZ

vs.

DEFENDANTS

MOTION FOR SANCTIONS ON
OPPOSING COUNSEL FOR
DEFAMATION AND PERJURY

MICHAEL C. THOMPSON
GREGORY R. HOLMES
YOUTUBE LLC

Jury Trial Demanded: YES

PLAINTIFF TODD MICHAEL SCHULTZ, in Pro Per, requests that sanctions be placed on Conor D. Tucker per rule 4.1 (1)(2) for his defamatory and untruthful statements in YouTube LLC.'s (onward Youtube) motion to dismiss. Mr. Tucker is wrong. I do not "know" that my claims are barred by Section 230 and I am nearly as certain as one can reasonably be that they are NOT barred. Mr. Tucker misrepresented my character many times in his motion. He stated that I sought to "vent out my anger on

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1 Youtube". That is not true. Youtube is potentially liable under applicable laws such as
2 Misprision as well as Fraud. It is a certainty that fraud occurred. All gestures from
3 Google LLC's Youtube insinuate and state as fact that they take down content that
4 violates guidelines. Copyright infringement is also not allowed. The latter is a given
5 based on the materials posted by Mr. Thompson. The former, meaning which guidelines
6 were broken, many is the answer. Many. And my reports, which the ToS encourages
7 users to do in order to protect against bad behavior, if not received, constitute Fraud on
8 Youtube's part, in my opinion. If they received the reports, then it is likely Misprision
9 was going on at Youtube and neither scenario is barred by 230 which "does not change
10 law" per the law's own wording. It is nearly impossible, as Plaintiff sees it that his claims
11 are barred by 230. Thus, Mr. Tucker, in any outcome, must retract and accept sanctions in
12 the form of monetary or injunctive relief to be determined by the court. If the court
13 requires that I request specific relief, I will provide for such a request. Plaintiff requests a
14 retraction and typical relief under similar circumstances.
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22 Dated Wednesday August 2nd, 2023

23 SIGNATURE of Plaintiff acting in Pro Per

24 Todd Michael Schultz
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